

**Mr John Hopkins
Project Manager CMS/FS Project
Environmental Restoration EG&G Rocky Flats
P O Box 464 Building 080
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Dear Mr Hopkins

Very truly yours

Twenty C Shagb

cc Gee
Schubbe

MEETING MINUTES CMS/FS PROGRAMMATIC TASKS

DATE January 6 1994

LOCATION EPA Tundra Room Denver

ATTENDEES Hopkins Houk, Laurin, Schubbe of EG&G Fraser Kleeman, Lavelle of EPA Norbury Schieffelin of CDH Grace Dille, Greengard Pepe Guillaume Reeves representing DOE and Shangraw Gee of Engineering Science Inc

NARRATIVE An agenda for this meeting was provided by DOE and is attached to the minutes as are hand outs The items discussed follow the agenda as do these minutes

The first agenda item was the integration of OU1 into the programmatic CMS/FS process The current status of OU1 was delineated That status is Technical Memorandum 10 (Preliminary Remediation Goals) has been returned to DOE with comments by EPA CDH has turned TM 10 over to the state attorney general's office for comment The OU1 FS is for the most part on hold until CDH input is received DOE pointed out that with little progress on OU1 currently the programmatic FS process may progress enough to allow incorporation of OU1 DOE proposed that incorporation of OU1 into the programmatic FS be agreed upon, with possible accompanying need for schedule extensions acknowledged EPA declined response for now until further review of the programmatic proposal

Agenda Item 2 was a discussion of EPA and CDH comments on the CMS/FS task approach presented at the meeting of December 23 Representatives from each agency stated they were not yet ready to comment on the DOE task by task approach Fraser of EPA had reviewed the approach and had no problems with it He recommended building into the logic diagram some delays for decisions on the ARAR's issues EPA also recommended continuing on Task 6 before resolution of TMI issues and not holding up PRG's for completion of the COC TM

Agenda Item 3 was a presentation by DOE/EG&G of the CMS/FS logic diagram and detailed schedule for OU2 FS work EG&G requested comments on the logic diagram and specifically requested agency review and consensus on the proposed meetings with agencies and decision/buy in points delineated throughout the process Those meeting/decision points included after PRG determinations (Task 2) after initial screening/list of alternatives (Task 3) and after detailed analysis (and recommended remedy Task 8) DOE/EG&G proposed that with agency concurrence throughout the process the IAG mandated review durations of the CMS/FS draft report could be substantially cut resulting in a more timely final CMS/FS report The IAG duration for review of a draft CMS/FS report is one year

EPA proposed that sitewide PRG s be proposed streamlining the PRG process for each individual OU DOE responded that they would consider the recommendation and get back to the group with their response

All parties voiced concern over formalization of concurrences reached through the interactive review/input process It was agreed that decisions made at meetings could be formalized with a Memorandum of Understanding (MOU) from a meeting, signed by all meeting attendees This is best done at the end of a meeting before adjournment

Due to time constraints on the meeting room, Agenda Item 4 (risk requirements for FS) was postponed until the next meeting A handout (attached) on this subject was passed out for consideration before next week

Agenda item 5 schedule meetings was completed A meeting is scheduled for Thursday January 13 at 1 pm location to be determined The focus will be to receive agency comment on the logic diagram/schedule presented at this meeting and discuss the risk issues

ACTION ITEMS

- 1 DOE/EG&G and EPA/CDH should each propose a resolution to the future land use/ARAR s issues in the near future The parties can then discuss and resolve this problem
- 2 EPA and CDH will give DOE any further comments on the task by task programmatic approach proposed on December 23
- 3 EPA and CDH will review and prepare comments on the proposed logic diagram/schedule with particular focus on the agency input/decision points A meeting was set up for January 13 to receive agency comments
- 4 DOE will respond to EPA s recommendation that sitewide PRG s be developed to streamline the OU specific process
- 5 EPA and CDH will respond to DOE request to incorporate OU1 into the programmatic FS process

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AGENDA FOR DISCUSSION OF PROGRAMMATIC
FS/CMS ISSUES - ROCKY FLATS PLANT

DATE JANUARY 6, 1994
TIME, 9 AM
LOCATION US EPA

AGENDA ITEMS

- 1 INTEGRATION OF OU1 INTO PROGRAMMATIC CMS/FS APPROACH
- 2 REVIEW EPA/CDH COMMENTS ON FS/CMS TASK APPROACH
- 3 REVIEW PROGRAMMATIC CMS/FS SCHEDULE/LOGIC DIAGRAM
- 4 DISCUSS RISK ASSESSMENT REQUIREMENTS FOR CMS/FS
- 5 SCHEDULE OU SPECIFIC MEETINGS FOR OUs 1 AND 2

Attendees

CNS/TS Meet

EPA 1/6/94

<u>Name</u>	<u>affiliation</u>	<u>phone</u>
Cindy Lee	EG&G Contractor - ES	531 8100
John Hopkins	EG&G RF	966-8636
K ZEKE HOUK	EG&G OUI	966 8714
Joe SCHIEFFELIN	CDM	692-3386
Dave Norbury	CDH	692 3415
Eric Dille	DOE/Aguirre Eng	966-4561
Gary Kleeman	EPA	294-1071
BORNE LAVELLE	EPA	294-1067
Bill Frasch	EPA	294-1081
Michael Guillaume	DOE/Aguirre	966-4208
Tim Reeves	DOE/Aguirre	966-6124
TOM GREENGARD	SMS-RFO	705-5577
Jen Pepe	DOE	966-2184
Scott Grace	DOE/ER	966-7199
Dennis Schubbe	EG&G	966-8709
Pete Lauria	EG&G	966 8702
Tim SHANAHAN	ES	831-8100

Additional Risk Assessment

Issues in FS/CMS

- RFP IAG does not address FS/CMS risk assessment methodology detailed in RAGS Volume I - Human Health Evaluation Manual (Part C, Risk Evaluation of Remedial Alternatives, dated December, 1991)
 - Long-Term Risk
 - Residual risk
 - Protectiveness over time
 - Short-Term Risk
 - Short-term exposure
 - Short-term toxicity
 - Short-term community risks
 - Short-term worker risks

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Additional Risk Assessment Issues in FS/CMS (cont.)

- **Potential for problems similar to BRA without methodology in place**
- **Need to reach agreement with EPA and CDH regarding use of risk assessments in the remedy selection process**
- **Need EPA and CDH agreement on integration of requirements of DOE Orders 5400.5 and 5820.2A with FS/CMS requirements**

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Additional Risk Assessment Issues in FS/CMS (cont.)

- DOE Order 5820.2A - Radioactive Waste Management
 - Radiological performance assessment required for the disposal of low-level waste
 - Systematic analysis of the potential risks posed by waste management systems to the public and environment including a comparison of those risks to established performance objectives
 - ALARA

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Additional Risk Assessment Issues in FS/CMS (cont.)

- DOE Order 5400.5 (proposed rule 10 CFR Part 834) - Radiation Protection of the public and the environment
 - ALARA

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